

EXHIBIT C

Stuart Snyder

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1 A. The only thing that would be -- not that I would
2 have. I mean, I write notes on my desk blot calendar
3 like staff meeting. And I actually do save my old
4 calendar blotters. But it would probably just say staff
5 meeting, but not staff meeting regarding Trini Navarro.

6 Q. Do you think the decision to not go with those
7 three promotions at that point, to just go with one, was
8 because of Navarro personally?

9 A. Well, it was certainly the conclusion I drew
10 based on the decision that was made. I mean, there was
11 no way I know for certain. But, you know, I have been
12 doing this job a long time. And my argument -- I'm not
13 going to say argument. My statements to Guy Sapp in that
14 meeting were such that it didn't make sense not to fill
15 the positions because they would be making acting
16 sergeants on the road anyway.

17 And acting sergeants probably only do 50
18 percent of the job that a full supervisor does because
19 acting sergeants generally don't get involved in
20 disciplines, writing evaluations, sensitive matters.
21 Because they could be an acting sergeant one day and then
22 they are back to patrolman the next day. So work wise,
23 it's definitely more efficient to promote and get a
24 hundred percent work out of that person than use actors



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1 and get 50 work out of that person.

2 Q. If the decision was made to go with one promotion
3 instead of three, there was someone else besides Trini
4 Navarro who then did not get a promotion?

5 A. Yes.

6 Q. Do you think there was any focus or thought of
7 depriving that person of a promotion too?

8 A. Could be. I mean, there is nothing that I know
9 of. But --

10 Q. What do you know of in Trini Navarro's case? Do
11 you know he was promised a promotion?

12 A. No.

13 Q. Do you think he was highest on the available list
14 at that point in time?

15 A. I don't recall.

16 Q. What makes you think it was Trini?

17 A. Trini what?

18 Q. That Trini would have gotten a promotion but for
19 this decision.

20 A. I didn't say that he would. I just said that I
21 thought this decision deprived him of that. Obviously,
22 if you can only promote one when you've got three slots,
23 there's two people that don't get promoted and he's one
24 of them.



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1 Q. You are sort of going by arithmetic. But you are
2 not saying anything -- and I'm not faulting that. But so
3 your answer is based on, essentially, a process
4 elimination?

5 A. Right. If there was four promotions in this
6 office and there is six of the seven of us sitting here
7 and then you say we are only going to fill one of the
8 positions, then there is going to be several people
9 denied that position.

10 Q. Do you think it was intentional to deprive Trini
11 Navarro of a promotion?

12 A. I can't draw that conclusion specifically. But I
13 believe it's certainly possible.

14 Q. What would -- let's use the word like hunch.
15 What is your hunch?

16 A. My hunch is yes.

17 Q. What is that based on?

18 A. My hunch is based on the current administration,
19 meaning Guy Sapp as my closest contact because he's a
20 politically appointed person by Mr. Coons. Several
21 things happened when the new administration came in that
22 I look at as, to use a term -- and I don't know if it's a
23 proper term -- but meddling in simple department matters
24 such as who drives what car based on what I perceived as



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